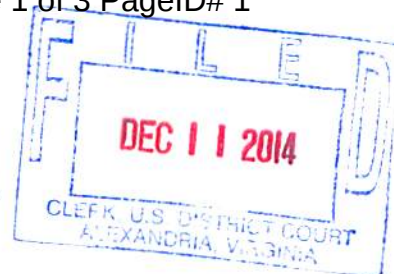


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



KEITH T. SAYLOR

Plaintiff,

v.

PINNACLE CREDIT SERVICES, LLC

Defendants.

Civil Action No. 1:14cv1709 AJT/TCB

**NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441(b)**  
**(FEDERAL QUESTION)**

PLEASE TAKE NOTICE that Defendant Pinnacle Credit Services, LLC ("Defendant") hereby removes to this case from the state court action described below.

1. On or about November 3, 2014, the plaintiff commenced an action in the Circuit Court for Loudoun County, Virginia, entitled *Keith T. Saylor v. Pinnacle Credit Services, LLC*, bearing Case Number 107CL0009078300. A copy of the summons and complaint, which consist of the papers filed in this case, is attached and marked as Exhibit A.

2. This Honorable Court has original jurisdiction of this action under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441(b) in that it presents a federal question, i.e., in that Plaintiff alleges violations of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, et. seq. and the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, et. seq.

3. Defendant was served on November 13, 2014 and this removal is timely pursuant to 28 U.S.C. § 1446(b).

4. To the best of the undersigned's knowledge, formed after reasonable inquiry, no other pleadings or documents, other than those attached as Exhibit A have been filed in this matter.

5. As required by 28 U.S.C. § 1446(d), Defendants will give notice of the filing of this notice to the Plaintiff and to the clerk of the Circuit Court for Loudoun County, Virginia, where the action is currently pending.

WHEREFORE, Defendant respectfully requests that the above captioned matter currently pending in the Circuit Court for Loudoun County, Virginia be removed to this Honorable Court.

THE LAW OFFICES OF RONALD S. CANTER, LLC



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*Attorneys for Defendant Pinnacle Credit Services, LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Notice of Removal and related documents was served this 11<sup>th</sup> day of December, 2014, by first class mail, postage prepaid to:

Ernest P. Frances, Esquire  
ERNEST P. FRANCIS, LTD.  
505 Wythe Street  
Alexandria, Virginia 22314  
[epfrancisltd@verizon.net](mailto:epfrancisltd@verizon.net)  
*Attorney for Plaintiff*



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Ronald S. Canter, Esquire  
*Attorneys for Defendant Pinnacle Credit Services, LLC*